



U.S. Department of Justice

*United States Attorney
Eastern District of New York*

*271 Cadman Plaza East
Brooklyn, New York 11201*

March 30, 2020

By ECF

The Honorable Peggy Kuo
United States Magistrate Judge
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: *Naftali E. Ausch v. Attorney General of the United States*,
Civil Action No. CV-17-2949 (Block, J.) (Kuo, M.J.)

Dear Judge Kuo:

This Office represents defendant Attorney General of the United States in the above-referenced matter, an employment discrimination suit brought by plaintiff Naftali E. Ausch arising out of his employment as a chaplain with the United States Bureau of Prisons (“BOP”). The undersigned writes on behalf of both parties to apprise the Court of the status of discovery, as directed by the case management order of January 10, 2020.

The parties have completed the majority of discovery in this matter. On March 4, 2020, defendant received responses to document demands and interrogatories. Additionally, the undersigned deposed plaintiff on March 5, 2020. Plaintiff’s counsel propounded discovery requests on February 27, 2020 and defendant is in the process of preparing responses to those requests.¹ The parties do not anticipate the need for expert discovery in this matter.

Although the undersigned has not yet received a settlement demand from plaintiff’s counsel, the parties anticipate that a settlement conference would be productive in this matter, and request that the Court schedule a settlement conference following the close of discovery, on April 30, 2020.

The parties thank the Court for its attention to this matter.

¹ The parties have agreed to a brief extension of time for the undersigned to provide defendant’s responses in light of delays caused by the ongoing coronavirus pandemic.

Respectfully submitted,

RICHARD P. DONOGHUE
United States Attorney

By: /s/ Shana C. Priore
Shana C. Priore
Assistant U.S. Attorney
(718) 254-6008
shana.c.priore@usdoj.gov